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June 16, 2025

**MEMO ENDORSED**

By ECF

The Honorable Jessica G.L. Clarke  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Paulino-Santos v. Metropolitan Transportation Authority, No. 23-cv-3471

Dear Judge Clarke:

We represent plaintiffs and the proposed class in this matter. We write to address the pending motion (Doc. 124) and upcoming Court conference scheduled for tomorrow, June 17, 2025 at 3:00 p.m. (Doc. 131).

Having had the opportunity to confer with Eric Prather at Schulte, Roth & Zabel, who is in the process of being retained for third party, non-retained expert Bharavi Desai, we are pleased to confirm plaintiffs' request to withdraw plaintiffs' Application for the Court to Request Pro Bono Counsel for Third Party Non-retained Expert (Doc. 124). Plaintiffs respectfully reserve the right to renew the motion in the unlikely event of any interruption of Mr. Prather's expected retention and representation.

Plaintiffs further concur with defendants (Doc. 134), and have confirmed with Mr. Prather, that there does not appear to be a need for the Court Conference scheduled for tomorrow. The parties are conferring about defendants' subpoena of Ms. Desai and working to resolve disputes without the need for Court intervention. Of course, plaintiffs remain available to appear if it would be useful to the Court.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Maia Goodell".

Maia Goodell

cc: Eric Prather, Esq. (by email)  
Robert Griffin, Esq. (by email)

IT IS HEREBY ORDERED that the conference in this matter, previously scheduled for June 17, 2025 at 3:00 p.m., is CANCELED. The Clerk of Court is respectfully directed to terminate ECF No. 124.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Jessica Clarke".

JESSICA G. L. CLARKE  
United States District Judge

Dated: June 16, 2025  
New York, New York